



Indiana Housing & Community Development Authority

To: Real Estate Department Partners
From: Real Estate Department- Compliance and Asset Management
Date: April 26, 2012

Notice: **RED-12-23**

**Re: FEDERAL FINANCIAL ACCOUNTABILITY AND TRANSPARENCY ACT OF 2006 ("FFATA")
REPORTING REQUIREMENTS**

FFATA reporting requirements applies all federal funding (specifically, HOME, CDBG, CDBG-D, and NSP3) awarded by IHCDA in the amount of \$25,000.00 or greater under all of IHCDA's federal programs (excluding NSP1 and assistance in the form of tax credit allocations).

As a sub-recipient, your entity must provide any information needed pursuant to these requirements. This includes (1) entity information, (2) the unique identifier of your entity, (3) the unique identifier of the parent of your entity, and (4) relevant executive compensation data, if applicable. This will require your entity to provide IHCDA with your entity's DUNS number and registering with the Central Contractor Registration ("CCR").

Executive Compensation

As described above, you will be required to report to the CCR, the names and total compensation of the five most highly compensated officers of your entity if your entity received eighty percent (80%) or more of its annual gross revenues from Federal contracts and Federal financial assistance (as defined at 2 CFR 170.320) and \$25,000,000.00 or more in annual gross revenues from Federal contracts and federal financial assistance (as defined at 2 CFR 170.320); and if the public does not have access to this information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986.

Exception to Executive Compensation Requirement

Your entity may certify that it received less than eighty percent (80%) of annual gross revenues from the federal government, received less than \$25,000,000.00 of its annual gross revenues from the federal government, already provides executive compensation to the Securities Exchange Commission, or meets the Internal Revenue Code exemption, and will not be required to submit executive compensation data into the CCR under FFATA, provided, that the your entity registers in the CCR and submits the other data requested.

Compliance requires that your organization take the following two (2) steps:

1. Obtain a DUNS number and Provide DUNS number to IHCDA (when requested by IHCDA).
A DUNS number may be requested from D&B by telephone (currently 866-705-5711) or the Internet (currently at <http://fedgov.dnb.com/webform>).
2. Register and maintain CCR status Registration information (must be updated annually) and provide copy of proof of registration to IHCDA (when requested by IHCDA). Information regarding the process to register in the CCR can be obtained at (<http://www.ccr.gov/startregistration.aspx>).

Please contact your Real Estate Production Analyst with any questions that you may have.

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